

PROPOSED ORDER
UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re Sears Holdings Corp 18-23538
SEARS & Roebuck and Company

Chapter 11

Debtor.

Case No.: 18-23537(rdd)

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**ORDER GRANTING *MISUSE* OF THE AUTOMATIC STAY IN CASE 18-23537 by
THE ENTITY BUYER IN A CALIFORNIA LABOR BOARD CASE. 741455 &
757376.**

Upon the motion (the "Motion") of Beau Brady LeBaron (claimant in claim number 24733/24734) (a) pursuant to 11 U.S.C. § 362(d)(1), from the automatic stay imposed in this case under 11 U.S.C. § 362(a) as to Movant's interest in real property commonly known wages unpaid or company loss forced on Mr LeBaron, including interest, Damages Penalties any all punitive damages that this court may impose for use the misuse of automatic stay that was not ordered for the Entity Buyer Transform Sr Home Improvement products Llc who utilized this us bankruptcy case number 18-23537 stated above on 2/26/20 in their legal response where they do accept their position of respondent for both 757376 and 741455 and infact commit fraud against the complaint in a California state case 741455 yet to be heard in California .

Your Honor I am asking this court to state the position of the court as to whether or not it even had or has a position with regards to 11 U.S.C. § 362(d)(1), from the automatic stay imposed in this case under 11 U.S.C. § 362(a) and if Transform Sr Home Improvement productS LLC THAT WAS CREATED BY ESL INVESTMENTS AFTER THE PURCHASE of the once protected SEARS HOME IMPROVEMENT PRODUCTS INC 18-23555 A divisiön of Sears Holdings Corporation debtor in case 18-23538

Please take notice the the new entity buyer submits what amounts to fraud by instructing the Industrial Relations Commission Investigator in a California State Case Number Wc-cm 757376 where no persons where present for from the Respondent in a hearing on 1/14/20 where The entity buyer acknowledges the California Case 741455 and 757376 in a document known as " the summary " in a Second California case cm-741455 where on page 1 Transform sr home improvement states the following

"The events as outlined in this position occurred prior, during and after the pendency of the respondents Bankruptcy proceedings. On October 15, 2018, Respondent filed for Chapter 11 Bankruptcy protection in the U.S. Bankruptcy Court for the Southern District of New York under Case Number 18-23537. In February 2019 substantially all of Respondent's assets were purchased by Transform Holdco LLC."

pursuant to 11 U.S.C. § 362(d)(4)(B),

Please do take Notice that the entity Buyer and a Division known as Transform SR home improvement products llc utilized the Court and its order of protection for a debtor in a case 18-23537 a subsidiary case where no mention of such protection existed .

Please consider I was barred I was ignored by counsel who were ordered by the court 11/10/21 to resolve this matter and from they point in I have been ignored .

It is this this case 18-23538 that creates my situation but it s compounded by a purchase by esl investments and their lack of preparation, or call it preparedness in the state of California to have licensing and signers in place in fact to do business where they don't until June 24, 2019

Where I am leased by the debtor not paid correctly, and all of that is passed on to Transform, SR home improvement products who then stands on top of that fact, and does not pay me properly forcing company loss on me is illegal in the state of California and it should not be something this quarterbacks as a fact for Transform SR home improvement product. It is illegal in The Court should consider damages, punitive damages, lost interest every dollar I can get because this is illegal and the fact that you're allowing it barring me from chambers . Well, I'm taking care of a parent who is dying of liver cancer, who passes away in July 2022 and I am only subjected to headlines and information that my hearing is canceled by the council of the debtor and then nothing no payment of wages unpaid. We're both are to resolve this type of situation quickly, and do nothing more than ignore the law and the buyer of Sears Holdings corporation who sits at the same address, still acts like they are, if in fact, the same company and they are not.

The claimant request the Court find Transform Sr Home Improvement products in violation of 11 U.S.C. § 362 rules and or the use of the automatic stay provided by The Honorable Judge Robert D Drain by providing California labor board investigators as well as State labor Investigators fraudulent statements where as stated above

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There is no form for this request . I m asking the court to decide in my favor and I am at this point a person who had been in communication and repeatedly requested this for labor board investigators who where provided the statement above that claims protection . The respondent in my case in calif responded as Transform !

I am still due \$50,615.73. I request the entity buyer pay punitive damages as well as interest as my cases closed due to this .

If transform sr Home Improvement Products is not protected I request that from in the form of a legal statement so I may provide this to re open a case closed a copy is included in my claim .24733

Dated: White Plains, New York

_____, 20__

Hon. Sean Lane
U.S. Bankruptcy Judge

As for the bar date in claim 24733-34 I was never given any detail regarding. My 3% deducted unlawfully by debtor who claims I did not meet bar date 4/19/19

I will pursue the pre-petition amounts in a new separate filing if need be . As I was not aware of any

problem until after the bar date . As SEARS HOLDINGS CORP PROMISED TO PAY ME AFTER THE BAR
DATE HAD OCCURRED.